

3:23-cv-01609

IN THE UNITED STATES DISTRICT COURT FOR  
DISTRICT OF NEW JERSEY

M&T BANK, N.A

PLAINTIFF,

vs.

Chryssoula Arsenis

Civil Action

Case No. 3:23-cv-01609-MAS-DEA

**AFFIDAVIT IN OPPOSITION  
OF THE CERTIFICATION SIGNED  
BY MS. LAURIE HANNAH.  
IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT.**

Defendant.

I, Chryssoula Arsenis, of full age, do hereby  
certify as follows:

This signed Certification in Support of Motion for  
Summary Judgment contains errors, Egregious  
misrepresentations intentional false Statements and  
overall it lacks validity. It should be noted, this  
certification is called "robo-signing" due to the  
robotic practice of signing the certification without  
reviewing the contents.

1. It appears Ms. Laurie Hannah, Vice President that I

had the pleasure to talk to her several times and exchanged correspondence with her. Please for more details see exhibit.

2. Starting with Paragraph 8 of this certification
3. "Mortgagor failed to make payment due on July 1, 2020" The Truth of the above lacks validity and contains egregious misrepresentation.
4. The mortgage loan was not in default on July 1, 2020. Defendant performed under a Trial Period(TPP) The loan was current on time following modification and later the Plaintiff breached the modification settlement agreement, fraudulently declared the loan in default and refused further payments as a matter of Fact.
5. Ms Laurie Hannah who told me personally to keep my money because the Bank is initiating a foreclosure action and M&T Bank will notify the Borrower of the Sheriff's sale.
6. I was delayed to send my late husband's death certificate because it had to come from Greece translated and authorized by the Greek Embassy.
7. The Complaint calls the undersigned as the fictitious wife of Charalampos Arsenis, therefore, the above declares my adult children, illegitimate.
8. Despite that I requested the financial documentation to be sent to me due to the discrepancies already appearing from April 1, 2020 to December 31, 2020 with the respect of the escrow

account in the amount of \$30,000.00. However, my request was ignored by Ms. Hannah.

\*  
9. Paragraph 9, "The Notice of Intent to Foreclosure on the Mortgage premises was sent to the Borrower." with great deal of incorrect computations of the amount due"

10. There is no mention in the false certification that the undersigned was not in Default but M&T decided to breach the modification agreement while in Forbearance due to Covid-19 pandemic. Due to the above intentional misrepresentations, humiliations, intimidation, harassment, threats of sheriff's sale, and age discrimination because of the legal effects of the Foreclosure matter. Despite that I filed a complaint for Age discrimination with M&T Bank's Vice President Jacob A on 07/14/2022 M&T Bank never responded to my complaint.

\*  
11. The Defendant is requesting Criminal penalties for submitting a False Certification to the Court attached in Support of Motion for Summary Judgment. The action was withdrawn on 03/30/2023 and the case was dismissed without prejudice by the Superior Court of New Jersey.

12. There are losses caused by the false signed certification signed by Ms. Laurie Hannah Therefore, the undersigned requests to be compensated by the lender for the foregoing false misrepresentations provided to the court by Ms. Laurie Hannah, which is the crux of the action that contains violations of the Federal Cares Act protection and RESPA violations which were raised as affirmative defenses on the counter claim.

13. Noted the Defendant reserves the right to identify further false statements in this signed certification by Ms. Laurie Hannah.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

*Chryssoula Arsenis*  
Chryssoula Arsenis

Sworn and subscribed to

Before me this 22 day

of May, 2023.

REKASH PURAN  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires March 22, 2026

Notary Public

